

March 26, 2025

Hon. Lewis J. Liman, District Judge
Southern District of New York, United States District Court
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**RE: Amended Complaint and Request to File Sealed TRO
Perry v. Monaco et al (24CV8736)**

Dear Hon. Justice Liman:

Hope all is well. I write to Your Honor in hope of an update regarding two matters:

- I. Motion to Amend Complaint, dated March 7, 2025 (dkt. 20); and
- II. Letter Request to File a Sealed Temporary Restraining Order (dkt. 21).

March 10, 2025, Plaintiff filed a Motion to Amend Complaint (dkt. 20). Therein, Plaintiff added two additional Defendants: (i) ADA Hannah Perlman, and (ii) The City of New York. As Plaintiff proceeds IFP (dkt. 5), Plaintiff respectfully requests Your Honor direct the Clerk of Court to issue summonses and deliver to the Marshals Service all paperwork necessary for the Marshals Service to effect service upon the two additional Defendants.

March 17, 2025, Plaintiff filed a letter request to file under seal a TRO (dkt. 21), pursuant Electronic Case Filing Rules (Section 6). The seal is necessary, as the TRO request relates to an unpublished confidential order of the New York Supreme Court, Appellate Division, First Department. Certain evidence necessary to evaluate the TRO is subject to Protective Seal (paragraph 52 of the Amended Complaint), preventing my ability to physically be in possession of the evidence. The evidence is in the possession of my counsel in a separate related matter. Counsel is able to forward that evidence directly to Your Honor, but it cannot be made publicly available. The sealing has been narrowly tailored to serve the purpose that justifies the sealing and otherwise consistent with the presumption in favor of public access to judicial documents. *See, e.g., Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006).

I respectfully request expedited review of item II. Letter Request, as the peril Plaintiff seeks to avoid remains imminent, and Plaintiff seeks to leave adequate time for Your Honor's review.

Best Regards,



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